

### REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-48 are currently pending, with Claims 3-47 directed to non-elected inventions. Claims 1, 2, 14, and 15 have been amended; and Claim 48 has been added by the present amendment. The changes and additions to the claims are supported by the originally filed specification and do not add new matter.

Initially, Applicants respectfully submit that previously withdrawn Claims 14 and 15 recite limitations analogous to the limitations recited in Claims 1 and 2, respectively. Accordingly, Applicants respectfully request that Claims 14 and 15 be examined together with Claims 1 and 2. Claims 14 and 15 are directed to a method of coding a moving image and recite steps analogous to the elements recited in apparatus Claims 1 and 2. Accordingly, Applicants respectfully submit that it would not present a burden to the Examiner to examine Claims 14 and 15 together with Claims 1 and 2. Accordingly, Claims 14 and 15 have been amended by the present amendment in a manner analogous to the amendments to Claims 1 and 2.

In the outstanding Office Action, Claims 1 and 2 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,990,955 to Koz (hereinafter “the ‘955 patent”).

Amended Claim 1 is directed to a moving image coding apparatus, comprising: (1) coding means for dividing an input moving image signal into a plurality of frame image signals, dividing each of the framed image signals into one or more area image signals, compression coding each area image signal into an area image code string, and adding frame header information indicating a compression coding mode of the frame to each area image code string; and (2) packetization means for collecting one or more of the area image code

strings to which the header information has been added, and for adding packet header information to the collected one or more area image code strings. Claim 1 has been amended for the purpose of clarification only and no new matter has been added.

The '955 patent is directed to a dual encoding/compression method and system for picture quality data density enhancement. Initially, Applicants note that the Office Action relies only on passages in the background section of the '955 patent. In particular, the Office Action relies on a description of MPEG-2 encoding and compression protocols. As shown in Figure 3, the '955 patent discloses that a group of pictures is divided into a plurality of frames, each of which can be further divided into slices, with each slice divided into macroblocks of luminance and chrominance values. Further, Figure 3 discloses that each frame is either an I, B, or P type MPEG-2 frame. Further, regarding compression, the '955 patent discloses that picture headers may be inserted to identify each frame and communicate frame-specific information, such as I, P, or B frame type.<sup>1</sup> Such frame information is needed in the system of the '955 patent to decode each frame based on whether the encoded frame information relies on prior or subsequent frame data. However, Applicants respectfully submit that the '955 patent fails to disclose coding means for adding frame header information indicating a compression coding mode of the frame to each area image code string, as recited in amended Claim 1. The picture headers disclosed by the '955 patent are inserted before an entire frame, and refer only to the frame type. The '955 picture headers are not added to area image code strings obtained by compression coding an area image signal that was obtained by dividing a frame signal into one or more area image signals. Further, the '955 patent fails to disclose that the picture headers indicate a compression coding mode of the frame, as recited in amended Claim 1. Rather, the picture header disclosed by the '955

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<sup>1</sup> See '955 patent, column 6, lines 39-41.

patent refers to how a frame is encoded. Accordingly, Applicants respectfully traverse the rejection of Claim 1 (and dependent Claim 2) as anticipated by the '955 patent.

Independent Claim 14 recites limitations analogous to the limitations recited in Claim 1. Moreover, Claim 14 has been amended in a manner analogous to the amendment to Claim 1. Accordingly, for the reasons stated above for the patentability of Claim 1, Applicants respectfully submit that Claims 14 and 15 patentably define over the '955 patent.

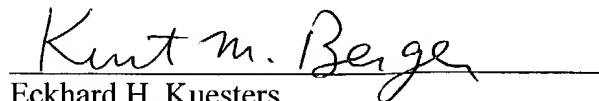
The present amendment also sets forth new dependent Claim 48 for examination on the merits. New Claim 48, which depends from Claim 1, recites that the coding means and the packetization means recited in Claim 1 are compatible with the MPEG-4 coding and compression protocols. New Claim 48 is supported by the originally filed specification and does not add new matter. Moreover, based on the asserted allowability of independent Claim 1, Applicants respectfully submit that new Claim 48 patentably defines over the '955 patent.

Thus, it is respectfully submitted that independent Claims 1 and 14 (and all associated dependent claims) patentably define over the '955 patent.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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